

**Tracey Burke**

Cyfarwyddwr Cyffredinol / Director General

Llywodraeth Leol, Tai & Newid Hinsawdd a Materion Gwledig  
Local Government, Housing & Climate Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Mr Adrian Crompton  
Auditor General for Wales  
Audit Wales  
1 Capital Quarter  
Tyndall Street  
Cardiff  
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10 June 2024

Dear Auditor General

Thank you for your report, ***Sustainable development? – making best use of brownfield land and empty buildings.***

I am pleased to enclose our detailed response to the recommendations made to the Welsh Government.

Welsh Ministers have been clear that through delivering the Programme for Government commitments they are determined to make our cities, towns and villages even better places in which to live and work. There are of course numerous challenges, but making best use of our existing resources will help us deliver more efficiently and effectively.

Welsh Ministers are clear that previously developed 'brownfield' land should be used in preference to greenfield sites where it is suitable for development. This policy supports sustainability and, as you note in your report, is set out in national planning policy. The Town Centres First policy supports this aim with previously developed land or existing buildings being considered for the location of public services.

However, the development on brownfield sites presents numerous challenges and barriers, many of which are highlighted in your report. Where possible and appropriate, we want to support local authorities, developers and other stakeholders to overcome those obstacles.

We are also focused on bringing empty buildings back into use. You will see in our response to recommendations the broad range of activity that Welsh Government teams are engaged in to help tackle empty properties.



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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The two recommendations for Welsh Government specifically, focus on recording details of sites that are available for regeneration and monitoring the levels of development on brownfield sites. As part of Local Development Plan scrutiny, we will seek to ensure that registers of brownfield and greenfield land are prepared and maintained. The Programme for Government commitment to *support the development of a register of empty buildings and help small businesses move into vacant shops* is also directly relevant to your recommendations.

Also the Transforming Towns regeneration programme, supports the development of Placemaking Plans in town and city centres across Wales. These plans are key documents developed through engagement with local people and businesses. A Placemaking Plan will set out what needs to be done to improve a town centre and provides an opportunity to identify both empty buildings and brownfield land for development.

Your report makes a valuable contribution to our ongoing work in this area, and we look forward to working with partners to take forward the recommendations.

Copies of this letter have been sent to the Chair of the Senedd Public Affairs and Public Administration Committee.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tracey Burke'.

Tracey Burke  
Director General  
Local Government, Housing & Climate Change and Rural Affairs

## Organisational response

**Report title:** Sustainable development? – making best use of brownfield land and empty buildings

**Completion date:** January 2024

| Ref | Recommendation | <b>Organisational response</b><br>Please set out here relevant commentary on the planned actions in response to the recommendations | <b>Completion date</b><br>Please set out by when the planned actions will be complete | <b>Responsible officer (title)</b> |
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| <p>R4</p> | <p>To help enable stakeholders to assess potential sites the Welsh Government should:</p> <ul style="list-style-type: none"> <li>work with councils to ensure that listings of identified sites for regeneration are reported by council area; and</li> <li>produce a national listing informed by the local listings and through working in conjunction with other public sector bodies.</li> </ul> | <p><b>We accept this recommendation.</b></p> <p><b>We are seeking to improve the identification of brownfield sites:</b></p> <ul style="list-style-type: none"> <li>As part of Local Development Plan scrutiny we will seek to ensure that registers of brownfield and greenfield land are prepared and maintained.</li> <li>We will explore opportunities to collate locally held data into a national register.</li> </ul> <p>In relation to empty properties, we are undertaking a range of work that will support implementing this recommendation, including:</p> <ul style="list-style-type: none"> <li>Work on the Programme for Government commitment to “<i>Support the development of a register of empty buildings and help small businesses move into vacant shops</i>” is ongoing. We have commissioned independent research which will help establish what small businesses would find most useful in terms of accessing empty town centre properties.</li> <li>We have established a small working group of local authorities who have been making progress on identifying empty buildings in their town centres. This group will pool existing best practice and consider how this can be developed further and rolled out more widely. The work programme will cover issues such as: commercial property vacancy data collection; maintenance of registers; support for businesses; current disconnects and challenges.</li> </ul> | <p>Aligned with LDP cycle.</p> <p>March 2025</p> <p>The research work will be completed in Autumn 2024.</p> <p>Autumn 2024</p> | <p>Chief Planner</p> <p>Deputy Director, Land Division</p> <p>Deputy Director, Homes and Places</p> |
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**R4  
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- The working group’s deliberations and the independent research on how small businesses access empty town centre properties will run in parallel over the coming months and both inform each other.

**Other developments include:**

- Making vacant buildings in town centres a mandatory consideration within the Placemaking Plans that we are supporting local authorities to develop;
- Placemaking Plans provide an opportunity to identify brownfield sites within town centres that provide appropriate development opportunities;
- Promoting the existing [Business Wales Property Database | Business Wales \(gov.wales\)](#);
- Through our Empty Property Enforcement scheme, we continue to support local authorities in establishing individual Empty Property Enforcement Action Plans for dealing with long-term empty properties, both commercial and residential, prioritising properties for enforcement action;

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Revenue funding to support the development of Placemaking Plans was provided in 2023/24. Subject to Ministerial approval, we will seek to allocate additional resources in 2024/25 to support this work.

Annual updates are requested on Action Plans.

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| <p>R4<br/>Cont.</p> |   | <ul style="list-style-type: none"> <li>• Evaluation of Enforcement: OB3 Research was appointed by the Welsh Government to undertake a review of the Empty Properties Enforcement scheme, with the aim of understanding the success and impact of the scheme to date. The evaluation concluded that the Empty Properties Enforcement support and fund is well-aligned to the policy priorities outlined by the Welsh Government in its Town Centres Position Statement. It recognised the importance of policy prioritisation at a national level continuing, supporting focus at a local authority level;</li> <li>• The Unnos programme includes an initiative to develop a guidance document for local authorities on empty homes. The programme is continuing to provide industry expert advice and assistance to local authorities on how to best use all their powers to bring back into use empty and dilapidated properties. The industry expert advice will continue throughout 2024/25, and the guidance document will be completed by the end of the 2024/25 financial year.</li> </ul> | <p>Complete.</p> <p>Guidance document for local authorities will be complete by March 2025.</p>                                 | <p>Deputy Director,<br/>Land Division</p> |
| <p>R5</p>           | <p>To help inform scrutiny of performance both locally and nationally the Welsh Government should create a national framework for monitoring and assessing levels of brownfield sites being developed compared to levels of sites available and levels of greenfield development.</p> | <p><b>We accept this recommendation. Ensuring that data on brownfield and greenfield sites is more readily accessible will support scrutiny and transparency.</b></p> <ul style="list-style-type: none"> <li>• National planning policy promotes the redevelopment of brownfield land ahead of greenfield. It also requires planning authorities to include policies and proposals in their LDPs for the rehabilitation and development of existing derelict sites where development is the preferred response. Data on brownfield and greenfield sites is collected through the LDP process and we will work with local planning authorities make more of this data easily accessible to stakeholders. Our response to Recommendation 4 commits us to explore opportunities to</li> </ul>  | <p>We will consult on reintroducing data collection requirements as part of a consultation on planning fees in Summer 2024.</p> | <p>Chief Planner</p>                      |

**R5  
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collate locally held data into a national register and that has the potential to support scrutiny and improve transparency.

- Planning authorities produce Urban Capacity Studies as part of the evidence base for LDPs which identify vacant sites suitable for development. LDP Annual Monitoring Reports (AMRs) provide information on the split between brownfield and greenfield development.
- Prior to Covid the information from AMRs was collated to produce a national data set. Going forward, we will review how to make best use of this data on a national basis to help inform scrutiny.

Aligned with LDP cycle.

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